

## **REMARKS**

The Office Action dated January 24, 2006, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-19, 21-40, and 42-50 are currently pending in the application, of which claims 1, 19, 32, and 40 are independent claims. Claims 1, 21, 30, 42, 49, and 50 have been amended to more particularly point and distinctly claim the invention. No new matter has been added. Claims 1-19, 21-40, and 42-50 are respectfully submitted for consideration.

### **Claim Objections**

Claims 21, 30, 42, 49, and 50 were objected to because of their dependency on cancelled claims 20 and 41. Claims 21, 30, 42, 49, and 50 have been amended to correct their dependency. It is therefore respectfully requested that this objection be withdrawn.

### **Rejections under 35 U.S.C. 103(a)**

Claims 1-2, 14-15, 19, 21, 27-28, and 32-50 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,864,860 of Holmes (“Holmes”) in view of U.S. Patent No. 6,028,962 of Claassen et al. (“Claassen”). The Office Action took the position that Holmes teaches all of the elements of the claims except “determine a type of

classification based on said comparing and using the determined type to control how the information is communicated.” The Office Action cited Claassen as teaching this limitation. Applicants respectfully traverse this rejection.

Claim 1, upon which claims 2-18 depend is directed to a method of communicating information. The method includes comparing a current item list containing a plurality of current items with a reference item list containing a plurality of reference items, determining a type of classification based on said comparing of the items of the lists, and using the determined type of classification to control how the information is communicated.

Claim 19, upon which claims 21-31 depend, is directed to a method of communicating. The method includes classifying at least one item of a current list containing a plurality of items by comparing the current list with a reference list containing a plurality of items. The method also includes, based upon the classifying of the at least one item of the current list, forming a compressed list including said at least one item. The method further includes transmitting said compressed list. The method additionally includes determining a type of classification based on said comparing.

Claims 32, upon which claims 33-39 depend, is directed to a device for communicating compressed information. The device includes a processor for comparing a current item list containing a plurality of current items with a reference item list containing a plurality of reference items and for determining a type of classification

based on said comparing of the items of the lists and communicating the compressed information based upon the determined type of classification.

Claim 40, upon which claims 42-50 depend, is directed to a device for communicating information. The device includes a processor for classifying at least one item of a current list containing a plurality of items by comparing the current list with a reference list containing a plurality of items and based upon the classifying of the at least one item of the current list forming a compressed list including said at least one item. The device also includes a transmitter for transmitting said compressed list. The processor determines a type of classification based on said comparing.

Applicants respectfully submit that the combination of Holmes and Claassen fails to disclose or suggest all of the elements of any of the presently pending claims.

Holmes relates to compression of structured data. Specifically, as explained in columns 3-4, Holmes relates to data compression in the area of delimited text databases. In Holmes, each row (or record) of data contains a set of fields delimited from each other by a character. Holmes discloses comparing a field of a current record with a corresponding field of a previous record. Holmes suggests creating a compressed form of the current record based on the current row. The compressed form of the current record is the same as the current record except that, if the contents of a field of the current record are identical to that of the corresponding field in the previous record, a single character (such as ".") is used in place of the contents. When all of the fields have been compared

and (if appropriate) compressed, the compressed form of the current record is passed to the client.

Claassen is directed to a system and method for variable encoding based on image content. Claassen aims to compress images that may contain portions with dissimilar image content, such as bi-level text, graphics, half-tone images, and multi-level image data. Claassen also aims to classify windows and code the windows based on the classification. All of Claassen is directed toward image compression techniques. Nothing in Claassen suggests or hints at applications beyond image compression.

The Office Action suggested that the combination of Claassen and Holmes renders the above-identified claims obvious. Applicants respectfully submit that the combination is improper. Claassen and Holmes are from different fields of compression. Claassen seeks to compress image data, while Holmes compresses structured data in a data sequence having a plurality of records.

The Office Action took the position that it would have been obvious to combine Claassen with Holmes to efficiently improve the effect of the compression, thereby enabling a reduction in the amount of data to be transferred. However, there is no obvious way to combine the graphic compression techniques described in Claassen with the structured data compression scheme of Holmes. The two references provide different, incompatible techniques for compression designed to work in the two separate fields of compression in which the two references respectively are located.

Motivation to combine can come from the references themselves, from the nature of the problem, or from the knowledge of one of ordinary skill in the art. With regard to Holmes' and Claassen's disclosures, there is nothing in the references that would motivate the combination of the graphics compression technique and the structured data compression technique. The Office Action's suggestion that the combination would reduce the amount of data to be transferred falls flat. Neither reference suggests that modifying Holmes' system with Claassen's system would reduce the amount of data transferred.

Finally, as Holmes' system is character-based (column 2, lines 53-58) and Claassen's system is graphical (column 4, lines 10-16), Applicants respectfully submit that the two systems are incompatible, and therefore could not be readily combined.

Therefore, Applicants respectfully submit that Holmes and Claassen cannot be properly combined. As such, claims 1, 19, 32, and 40 are not rendered obvious by Holmes and Claassen.

Claims 2, 14-15, 21, 27-28, and 33-50 depend from claims 1, 19, 32, and 40 respectively and recite additional limitations. Accordingly, it is respectfully submitted that claims 2, 14-15, 21, 27-28, and 33-50 recite subject matter that is neither disclosed nor suggested in the cited art.

Therefore, it is respectfully submitted that each of claims 1-2, 14-15, 19, 21, 27-28, and 32-50 recites subject matter that is neither disclosed nor suggested by the

combination of Holmes and Claassen. It is thus respectfully requested that this rejection be withdrawn.

Claims 5-13 and 25-29 were rejected under 35 U.S.C. 103(a) as being unpatentable over Holmes and Claassen in view of U.S. Patent No. 6,535,925 of Svanbro et al. (“Svanbro”). The Office Action took the position that Holmes and Claassen teach most of the elements of the claims, except for some elements related to encoding the information. The Office Action cited Svanbro to remedy the deficiencies of Holmes and Claassen. Applicants respectfully traverse this rejection.

Holmes and Claassen are discussed above. Svanbro relates to packet header compression using division remainders. Specifically, in cols. 5-8, Svanbro describes a header compression (Figure 3), time stamp compression (Figure 4), time stamp decompression (Figures 5 and 7), and header decompression (Figure 6). Svanbro recommends using convention header compression techniques augmented by separately compressing the time stamp. With regard to the time stamp compression, Svanbro teaches that advance knowledge obtained by empirical observation can be used to reduce the number of bits needed to encode a relatively predictable time stamp in an application such as a real-time speech service.

Applicants respectfully submit that there is no motivation to combine Svanbro with Claassen for essentially the same reasons there is no motivation to combine Holmes with Claassen. Svanbro and Claassen are aimed at compressing radically different kinds of information. Thus, one of ordinary skill interested in compressing images might look

to Claassen, but would not look to Svanbro. Similarly, one of ordinary skill interested in compressing header data might look to Svanbro, but would not look to Claassen. Therefore Applicants respectfully submit that the combination of Svanbro and Claassen is an improper combination.

### **Conclusion**

For the reasons explained above, it is respectfully submitted that each of claims 1-19, 21-40, and 42-50 recites subject matter that is neither disclosed nor suggested in the cited references. It is therefore respectfully requested that all of claims 1-19, 21-40, and 42-50 be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

  
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